IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

UNITED STATES OF AMERICA.,)	
)	
Plaintiff,)	
)	CIVIL ACTION FILE
V.)	
)	NO. 1:16-CV-03088-ELR
STATE OF GEORGIA, et al.)	
)	
Defendant.)	
)	

DEFENDANTS' CROSS NOTICE OF DEPOSITION OF HALEY LIVINGSTON, DIRECTOR OF HARRELL LEARNING CENTER GNETS PROGRAM

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Defendants, by and through their counsel of record, will take the deposition of **Haley Livingston**, **Director of Harrell Learning Center GNETS Program** (hereinafter "Deponent"), on January 30, 2023 beginning at 9:00 a.m. Eastern Time, or such other time as is agreed upon by the parties, at RESA Office, 1450 N. Augusta Avenue, Waycross, GA 31503 or by way of a virtual format, if counsel so agree, or at another location mutually agreed upon by the parties. If, for any reason, the taking of said deposition is not completed on said date, it will continue from day to day, excluding weekends and holidays, until completed.

PLEASE TAKE FURTHER NOTICE that pursuant to Fed. R. Civ. 30(b)(3) Defendants intend to utilize a stenographic method of recording which permits the "real time" instant visual display of testimony.

PLEASE ALSO TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(3)(A), the deposition testimony will be recorded by stenographic and audiovisual means. The deposition will be videotaped and Defendants reserve the right to use at the trial of this action the video recording of the deposition.

Respectfully submitted,

/s/ Josh Belinfante

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